

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

BAYERISCHE MOTOREN WERKE AG,  
et al.,

Plaintiffs,

v.

FORAS TECHNOLOGIES LTD.,

Defendant.

Case No. 1:24-cv-00363-LMB-WEF

JURY TRIAL DEMANDED

**PLAINTIFF ROBERT BOSCH GMBH'S  
OPPOSED MOTION TO SEVER AND STAY**

Plaintiff Robert Bosch GmbH hereby moves to sever Defendant Foras Technologies Ltd.'s allegations of infringement as to U.S. Patent No. 7,502,958 ("the '958 patent") from its allegations of infringement as to U.S. Patent Nos. 7,627,781 and 7,624,302 and to stay those severed allegations pending review by the United States Patent and Trademark Office of the '958 patent. The reasons for granting this Motion are elaborated in the accompanying brief, and accordingly, this Motion to Sever and Stay should be granted and the attached Proposed Order entered.

Dated: June 28, 2024

Respectfully submitted,

*/s/Lionel M. Lavenue*

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2024, I caused the foregoing **PLAINTIFF ROBERT BOSCH GMBH'S OPPOSED MOTION TO SEVER AND STAY** to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/Lionel M. Lavenue

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**CERTIFICATE OF CONFERENCE**

On the 3rd day of June, 2024, counsel for Plaintiff Robert Bosch GmbH conferred with counsel for Defendant Foras Technologies Ltd. concerning the relief sought in this Motion, and was advised that Foras opposed this Motion.

/s/Lionel M. Lavenue

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